

1 PAMELA Y. PRICE, ESQ. (SBN:107713)  
2 PRICE AND ASSOCIATES  
3 901 Clay Street  
4 Oakland, California 94607  
5 Telephone: (510) 452-0292  
6 Facsimile: (510) 452-5625  
7 E-mail: [pamela.price@pypesq.com](mailto:pamela.price@pypesq.com)

8 Attorneys for Plaintiff  
9 REGGIE HAMILTON

10 CURTIS E. ALLEN, ESQ. (SBN: 187748)  
11 LAW OFFICE OF CURTIS ALLEN  
12 303 Twin Dolphin Drive, Sixth Floor  
13 Redwood City, California 94065  
14 Telephone: (650) 868-6620  
15 Facsimile: (650) 362-1864  
16 E-mail: [curtis.e.allen.esq.@gmail.com](mailto:curtis.e.allen.esq.@gmail.com)

17 Attorneys for Plaintiff  
18 REGGIE HAMILTON

19 LOUIS A. LEONE, ESQ. (SBN: 099874)  
20 CLAUDIA LEED, ESQ. (SBN: 122676)  
21 STUBBS & LEONE  
22 A Professional Corporation  
23 2175 N. California Blvd., Suite 900  
24 Walnut Creek, CA 94596  
25 Telephone: (925) 974-8600  
26 Facsimile: (925) 974-8601  
27 E-mail: [leonel@stubbsleone.com](mailto:leonel@stubbsleone.com)  
28 [leedc@stubbsleone.com](mailto:leedc@stubbsleone.com)

Attorneys for Defendants  
THE REGENTS OF THE UNIVERSITY OF CALIFORNIA,  
PAMELA E. ROSKOWSKI, JON EASTERBROOK, and  
BARNEY RIVERA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

REGGIE HAMILTON,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, PAMELA E. ROSKOWSKI,  
JON EASTERBROOK, BARNEY RIVERA  
and DOES 1 through 15,

Defendants.

**Case No.: C10-01622 DMR**

**STIPULATION AND PROPOSED  
ORDER CONTINUING DISCOVERY  
DEADLINES AS MODIFIED**

The parties hereby stipulate by and through their undersigned counsel of record to request that this Court continue the lay and expert witness discovery deadlines by approximately thirty days as set for the below.

Good cause exists for the above requests, as follows:

1. At the October 11, 2011 settlement conference before Magistrate Judge Joseph C. Spero the parties reached a settlement in principle.
2. Based on the settlement in principle the parties have stayed discovery since October 11, 2011.
3. The parties are currently working on the details of settlement, some of which require the Regents to seek detailed internal guidance.
4. The Regents are currently drafting a detailed settlement agreement, but have not forwarded the draft to Mr. Hamilton
5. The Regents shall forward Mr. Hamilton the draft settlement agreement on or before December 14, 2011.

- 1 6. It is anticipated that once finalized and executed, the settlement agreement  
2 will obviate the need for further litigation in the matter.
- 3 7. The deadline to complete lay discovery and designate expert witnesses is  
4 currently December 14, 2011, and the deadline to complete expert witness  
5 discovery is January 13, 2012.
- 6 8. The last day to hear dispositive motions is January 5, 2012 and the Final  
7 Pretrial Conference Statement and Trial Briefs are due February 4, 2012.
- 8 9. Continuing the lay discovery and expert witness disclosure deadline to  
9 January 16, 2012 and the completion of expert discovery to February 3, 2012  
10 will allow the parties to focus all of their attention on settlement the matter.

11 Given all of the above, a continuance of the Case Management Conference and  
12 Discovery deadlines will serve judicial economy and spare the parties considerable and  
13 likely needless discovery-related expense.

14 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

15 PRICE AND ASSOCIATES

16  
17 DATED: December 8, 2011

17 /s/  
18 PAMELA Y. PRICE, ESQ.  
19 Attorneys for Plaintiff REGGIE  
20 HAMILTON

21 DATED: December 8, 2011

22 LAW OFFICE OF CURTIS E. ALLEN

23  
24 /s/  
25 CURTIS E. ALLEN, ESQ.  
26 Attorneys for Plaintiff REGGIE  
27 HAMILTON

STUBBS & LEONE

DATED: December 8, 2011

/s/

CLAUDIA LEED, ESQ.  
Attorneys for Defendants THE  
REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,  
PAMELA E. ROSKOWSKI, JON  
EASTERBROOK, and BARNEY  
RIVERA

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The deadline to complete all lay discovery and to designate expert witnesses is continued to January 16, 2012. The deadline to complete expert witness discovery is continued to February 3, 2012. Final Pretrial Conference Statement and Trial Briefs are due February 24, 2012. All other dates previously set by the court shall remain in effect.

The Case Management Conference scheduled for December 14, 2011 at 1:30 p.m. has been CONTINUED to January 11, 2012 at 1:30 p.m. An updated joint Case Management Conference statement is due by January 4, 2012.

DATED: December 9, 2011



DONNA M. RYU  
United States Magistrate Judge